

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Brandon L. Phillips, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a Criminal Complaint for Zaveeyon TEASLEY, herein after referred to as TEASLEY.

2. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms & Explosives (ATF) I am a Special Agent with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been since 2010. Prior to my employment with ATF, I was employed as a Federal Officer with the United States Secret Service. As a part of my training with the ATF, I graduated from the Federal Law Enforcement Training Center, Criminal Investigator School, in Glynco, GA. I have also graduated from the ATF Special Agent Basic Training Academy in Glynco, GA.

3. Based on the facts set forth in this affidavit, there is probable cause to believe that a violation of 18, United States Code 922(u), Theft of Firearms from a Federal Firearms Licensee, (the TARGET OFFENSE) has been committed by Zaveeyon TEASLEY and other persons.

4. This affidavit is intended to show merely that there is probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

RELEVANT STATUTE

5. Pursuant to 18 U.S.C. § 922(u), it is unlawful for a person to steal or unlawfully take or carry away from the person or premises of a person who is licensed to engage in the business of dealing in firearms, any firearm in the licensee's business inventory that has been shipped or transported in interstate or foreign commerce.

BASIS OF INFORMATION

6. Except as otherwise noted, whenever in this Affidavit I assert that a statement was made or conduct was observed, the information was provided by another law enforcement officer (who may have had either direct or hearsay knowledge of the statement) to whom I have spoken or whose report I have read and reviewed. Likewise, any information pertaining to vehicles and/or registrations, personal data on subjects, and record checks has been obtained through the Law Enforcement Automated Data System (LEADS) from the State of Ohio or the National Crime Information Center (NCIC) computers.

PROBABLE CAUSE

7. On November 3, 2022, at approximately 4:27 a.m., three unknown suspects used a stolen Kia Optima to drive through the store front of Summit Armory (a Federal Firearms Licensee) located at 2417 N. Cleveland Massillon Road, Akron, Ohio, 44333, and used a second vehicle, believed to be a black in color Kia Sportage, to escape from the area. One suspect drove the stolen vehicle into the building and the other two entered behind it on foot, gaining access to the entire store. All suspects were wearing masks and gloves. The unknown individuals then ran to a glass display case within the store and smashed it using a hammer to remove most of the guns inside. In total, the suspects stole thirty (30) firearms, including two rifles, from the store's inventory before officers from Bath Police Department (Bath PD) arrived.

8. Upon arrival, officers from Bath PD observed the stolen Kia Optima in the front entrance way of the Armory. Officers searched the Armory and did not find anyone inside. Officers observed that the hammer used to break the glass case containing guns was laying on

the floor. The owner was contacted and responded to the store to provide information on the stolen inventory.

9. Items at the scene, including the hammer inside the store and a lighter found inside the driver's side of the Kia Optima that was driven through the front glass windows, were swabbed and submitted for DNA analysis.

10. During a review of surveillance video from Summit Armory, I observed the black in color Kia Sportage and Kia Optima traveling northbound on N. Cleveland Massillon Road, south of Summit Armory, prior to the break-in, entering the parking lot of Summit Armory at approximately 4:17 a.m. The vehicles and three suspects remained on the property of Summit Armory from that time until the suspects fled following the theft. Surveillance video then showed the black in color Kia Sportage after the break-in, at approximately 4:28 a.m., depart northbound from the area in the opposite direction from which it came.

11. Prior to driving the Kia Optima into the store, the three masked suspects can be seen on video surveillance walking outside the front of the store and appeared to discuss a plan while looking into the windows. One of the suspects was dressed in a black long sleeve sweatshirt and torn blue jeans, and wore black shoes with a distinct back sole of the shoe that appeared to have a cut in the heel. The suspect wore what appeared to be a clear plastic face shield on his face. The below photos depict the suspect, as seen on store surveillance video, as well as the distinct heel of the shoe.



12. On November 5, 2022, officers from the Cleveland Police Department (CPD) encountered TEASLEY asleep in a stolen Hyundai Elantra which had a broken rear window and the steering column had been disassembled (“peeled”) in order to start the vehicle without a key. Upon his arrest, TEASLEY was found to possess a Glock model 43X 9mm pistol in his jacket pocket. The firearm contained an empty magazine. A check of the firearm’s serial number revealed that the firearm had been stolen during the theft from Summit Armory on November 3, 2022.

13. On December 21, 2022, CPD Police Officer (P.O.) Ketchum #1000 and P.O. Vales #2511 responded to the Walmart store 3400 Steelyard Drive, Cleveland, Ohio, to assist off-duty P.O. Renshaw #413, who had observed three black males attempting to break into a Kia vehicle in the Walmart parking lot. P.O. Renshaw reported that she watched store security video and saw the males in the parking lot, looking into and trying to open vehicles’ door handles. P.O. Renshaw reported that one of the males had something in his hand that looked like a knife or screwdriver.

14. Upon the officers’ arrival, P.O. Renshaw advised that the males saw the officers and started to walk away. P.O. Renshaw provided descriptions of the males. Responding officers observed two males walking quickly away from them and stopped them. The males were identified as TEASLEY and a 15-year-old juvenile.

15. During the investigation, officers located a screwdriver on TEASLEY’S person and a Glock model 26 9mm pistol on the juvenile’s person. A check of the firearm’s serial number revealed that the firearm had been stolen during the theft from Summit Armory on November 3, 2022.

16. While officers were still on-scene, the third male observed by P.O. Renshaw approached the officers and stated that he had been at Walmart with his mother, who left. The male, who refused to identify himself, stated the other males were friends of his and that he had not been involved with whatever they were doing. P.O. Renshaw advised that she observed the third male with the 15-year-old juvenile and TEASLEY in the parking lot. The male and his mother refused to identify the male, who was detained so he could be identified. The third male was identified as a 16-year-old juvenile. P.O. Renshaw advised that further review of the video revealed that the three males arrived in what appeared to be a stolen Kia vehicle.

17. On December 21, 2022, I was notified of the recovered stolen firearm and responded to the Walmart, 3400 Steelyard Drive, Cleveland, OH, to obtain information from the CPD officers. I then interviewed TEASLEY at the CPD Second District. TEASLEY was advised of his *Miranda* rights. During the interview, TEASLEY provided his current residence address as the TARGET RESIDENCE. TEASLEY stated that the home was owned by his mother and that he stayed there on a regular basis. At the conclusion of the interview, TEASLEY agreed to and voluntarily provided a buccal swab for DNA comparison.

18. On January 3, 2023, DNA test results from the Ohio Bureau of Criminal Investigation and Identification (“BCI”) indicated that the DNA profile found on the hammer used to smash the glass case at Summit Armory on November 3, 2022, was consistent with the DNA profile of the 16-year-old juvenile identified with TEASLEY at the Walmart on December 21, 2022. Test results further showed that the DNA profile found on the lighter recovered from the driver’s side of the stolen Kia that was driven into Summit Armory on November 3, 2022, was consistent with the DNA profile of TEASLEY.

19. On January 9, 2023, a federal search warrant was obtained for TEASLEY's residence, 9308 Columbia Avenue, Cleveland, OH.

20. On January 11, 2023, the warrant was executed on TEASLEY's residence by ATF Special Agents and TFOs, Bath Police Department and CPD. During the search of the residence, TEASLEY's bedroom was identified and searched for evidence related to the FFL burglary. In the closet, investigators located a black pair of Ugg brand sneakers with the distinctive cut in the soles, consistent with those worn by one of the offenders on November 3, 2022.

21. TEASLEY was interviewed by Bath Police Department Detective Michael Gabel and Cleveland Police Department Detective Allan Soros. TEASLEY was advised of his *Miranda* rights and stated he understood. TEASLEY also signed a *Miranda* rights waiver form, time stamped at 7:00 AM. TEASLEY was confronted with the evidence obtained during the course of the investigation, as previously outlined in this affidavit. TEASLEY was shown a photo of the shoes from the person in the FFL surveillance photos and the shoes located in his room. TEASLEY confirmed that he was the person in the surveillance video and that the shoes found in his room were the ones he wore during the break-in at Summit Armory on November 3, 2022. TEASLEY stated on the morning of November 3, 2022, he was picked up by the juvenile previously listed in paragraphs 16 and 18 of this affidavit and the juvenile's brother, Lawrence McKissic, in a black Kia Sportage. TEASLEY stated the juvenile and McKissic handed him a clear face mask and drove around the corner to steal the Kia Optima that was later used to drive through the front entrance of Summit Armory. TEASLEY stated McKissic exited the Sportage and stole the Optima out of the driveway of 9219 Kempton Avenue, approximately 400 feet away from TEASLEY's address.

22. TEASLEY stated both vehicles drove to Summit Armory and parked in the rear, and that he and the other males eventually broke into the gun store, corroborating the video evidence of the event. TEASLEY admitted that he personally drove the stolen Kia Optima through the front of the building in order to gain entrance. TEASLEY stated after stealing the firearms from the business, the three males drove to a residential apartment building in the “projects” called “the plex” off of Hough Street in Cleveland. TEASLEY then met with two males named “Sincere” and “Nate.” The two individuals picked out the firearms they wanted and the others were taken to the juvenile’s house, but were later removed by the juvenile. TEASLEY stated he kept one firearm, which was the Glock he was arrested with on November 5, 2022.

CONCLUSION

23. Based upon the above listed facts and circumstances, I believe and assert that there is probable cause to believe that:

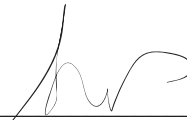
24. On or about the 3rd day of November 2022, Zaveeyon TEASLEY did unlawfully steal or unlawfully take or carry away from the person or premises of a person who is licensed to engage in the business of dealing in firearms, any firearm in the licensee’s business inventory that has been shipped or transported in interstate or foreign commerce, in violation of 18 U.S.C. § 922(u).

25. Based on the foregoing, I respectfully request that a Criminal Complaint be issued for Zaveeyon TEASLEY (DOB 01/14/03 and SSN ending in 9460) for the above referenced violations of 18 U.S.C. § 922(u).



BRANDON L. PHILLIPS
SPECIAL AGENT, ATF

On January 11, 2023, this affidavit was sworn to by the affiant, who did no more than attest to its contents pursuant to Crim. R. 4.1 (b)(2)(A), by telephone after a document was transmitted by email, per Crim R. 4.1



AMANDA M. KNAPP
U. S. MAGISTRATE JUDGE